REMARKS

I. Introduction

Pending claims 1-18 have been examined and are rejected. Specifically, claims 1-15

stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Britton et al., U.S.

Patent No. 6,442,577 (hereinafter "Britton"). Additionally, claims 16-18 stand rejected under 35

U.S.C. § 103(a) as allegedly being unpatentable over Britton in view of Yoon et al., U.S. Patent

No. 6,173,407 (hereinafter "Yoon").

Applicants overcome these rejections as follows.

II. Claim Rejections -- 35 U.S.C. § 102(e)

Claims 1-15 stand rejected under § 102(e) as allegedly being anticipated by Britton.

Claims 1, 6 and 11

Applicants amend claim 1 to further clarify that the claim is directed to "facilitating

creation and manipulation of compilations of content selected by a user" (*see also* claims 6 and

11). Furthermore, the function modules of the functional layer are "for executing a function

pertaining to the creation or manipulation of a compilation of content selected from the plurality

of content entities by the user" (*see* claims 1, 6 and 11). Applicants respectfully submit that

these amendments are not intended to narrow the scope of the original claims, but are rather for

precision of language and to explicitly recite within the claim what was believed to have already

been implicitly defined therein. Accordingly, these amendments do not foreclose application of reasonable equivalents.

Conversely, Britton describes that an Internet Content Provider (ICP) dynamically forms customized web pages for participating ISPs and organizations (Britton: Abstract). In Britton, the information and its arrangement for a participant's web page is predetermined and stored at the ICP (Britton: col. 7, lines 33-36; Figs. 3, 4 and 7). Thus, in Britton, a participant (*e.g.*, ISP or organization node) merely provides a service request (*i.e.*, web access) and receives a customized web page dynamically generated by the ICP according to the predetermined information (Britton: Figs. 3, 4 and 7).

Consequently, in Britton, users 102.N/120.P do not create and manipulate compilations of content selected by the user. Instead, the ICP dynamically forms and provides customized web pages to participants in order to attract/increase traffic flow (Britton: Abstract). Thus, Britton fails to disclose and cannot possibly suggest "providing a functional layer . . . comprising a plurality of function modules, each module for executing a function pertaining to the creation or manipulation of a compilation of content selected from the plurality of content entities by the user, wherein the plurality of function modules receives requests from the user via the user interface and returns information concerning the compilation of content", as recited in claim 1 (*see also* claims 6 and 11).

Furthermore, although advertisements to be included in a web page provided by the ICP can vary depending on whether a default advertisement is determined to compete with the

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participating network node, this is based on decision logic using predetermined data (Britton:

Fig. 5; Fig. 8, step 812) and is not controlled through user interaction with the function modules.

For at least the above exemplary reasons, claims 1, 6 and 11 are not anticipated by

Britton.

Claims 2-5, 7-10 and 12-15

Consequently, claims 2-5, 7-10 and 12-15 are not anticipated by Britton at least by virtue

of their dependency.

III. Claim Rejections -- 35 U.S.C. § 103(a)

Claims 16-18 stand rejected under § 103(a) as allegedly being unpatentable over Britton

in view of Yoon.

Because Yoon fails to cure the exemplary deficiencies noted above with respect to

Britton, claims 16-18 are patentable over a reasonable combination, if any, of Britton and Yoon

at least by virtue of their dependency.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Application No. 09/489,605
Attorney Docket No. A8514

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

The claims are amended as follows:

1.   (Thrice Amended) A method for facilitating creation and manipulation of compilations of content selected by a user, comprising the step of:

providing a functional layer for interfacing over a network with the user via a user interface and interfacing with a data repository containing a plurality of content entities, the functional layer comprising a plurality of function modules, each module for executing a function pertaining to the creation or manipulation of a compilation of content selected from the plurality of content entities by the user, wherein the plurality of function modules receives requests from the user via the user interface and returns information concerning the compilation of content.

6.   (Twice Amended) A program storage device readable by a machine, tangibly embodying a program of instructions executable by the machine to perform method steps for facilitating creation and manipulation of compilations of content selected by a user, comprising the step of:

providing a functional layer for interfacing over a network with the user via a user

interface and interfacing with a data repository containing a plurality of content entities, the

functional layer comprising a plurality of function modules, each module for executing a

function pertaining to the creation or manipulation of a compilation of content selected from the

plurality of content entities by the user, wherein the plurality of function modules receives

requests from the user via the user interface and returns information concerning the compilation

of content.

11.   (Twice Amended) A system for facilitating creation and manipulation of

compilations of content selected by a user, comprising:

a functional layer for interfacing over a network with the user via a user interface and

interfacing with a data repository containing a plurality of content entities; and

a plurality of function modules in the functional layer, each module including means for

executing a function pertaining to the creation or manipulation of a compilation of content

selected from the plurality of content entities by the user, wherein the plurality of function

modules receives requests from the user via the user interface and returns information

concerning the compilation of content.